

Application No. 10/233,353
Docket No. 8020702767 (formerly 6175-065)
Response to Office Action dated October 5, 2007

Remarks

As an initial matter, Applicants kindly request the correction of the "Attorney Docket No." from 8020699541 to **8020702767**.

Claims 1-22 are pending in this application. Claims 1, 3 4, 7-12 and 20 were rejected under 35 U.S.C. §102(e) as being unpatentable over Maudlin, U.S. App. No. 2004/0075697 (hereinafter "Maudlin"). Claim 2 is rejected under 103(a) as unpatentable over Maudlin in view of Gordon U.S. Pat. No. 7,043,701 (hereinafter "Gordon"). Claims 5, 6, 13, 14, 16 and 17 were rejected under 103(a) as unpatentable over Maudlin in view of Arnold U.S. Pat. No. 6,812,940 (hereinafter "Arnold"). Claims 18, 19, 21 and 22 were rejected under 103(a) as unpatentable over Maudlin in view of Arnold and in further view of Schell et al. U.S. Pat. No. 6,628,279 (hereinafter "Schell"). Reconsideration of the present application is respectfully requested.

Claims 1, 3 4, 7-12 and 20 were rejected under 35 U.S.C. §102(e) as being unpatentable over Maudlin. Claim 2 is rejected under 103(a) as unpatentable over Maudlin in view of Gordon. Claims 5, 6, 13, 14, 16 and 17 were rejected under 103(a) as unpatentable over Maudlin in view of Arnold. Claims 18, 19, 21 and 22 were rejected under 103(a) as unpatentable over Maudlin in view of Arnold and in further view of Schell. Applicants respectfully traverse these rejections.

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On pages 3, 7, 15 and 17 of the Office Action,¹ it is argued that the “face” limitation recited in independent claims 1, 18 and 20 is equivalent to either “visible surface or ‘skin’ of the architectural structure” or “surfaces of the architectural structures” disclosed in Maudlin. Applicants respectfully submit that the claimed “face” cannot be equivalent to the “surface” recited in Maudlin, because Maudlin does not teach or suggest hiding the “surface” of a 3D object.

Instead, Maudlin merely teaches hiding the whole 3D object. For example, in paragraph [0065] and Figures 16-17, Maudlin teaches hiding or showing building 130 as a whole by clicking the ‘hide’ or ‘show’ buttons. As opposed to Applicants invention, Maudlin’s alleged invention is not capable of removing, for example, the surface of building 130 in order to see the interior of the building. In fact, Mauldin does not teach or suggest how to only choose the surface of building 130, instead Maudlin merely discloses selecting all of building 130. (See, e.g., Maudlin at [0065]: “An indicator box 142 appears centrally located on the selected building 130 to indicate that the building 130 has been selected.”) Applicants respectfully submit that this is one of the fundamental differences between Maudlin and the claimed invention.

Admittedly, the terminology used by Maudlin is confusing when applied to Applicants’ invention. For example, Maudlin uses “model 54” to describe a collection of 3D objects. (See

¹ See, e.g., page 3, lines 9-16: “the first set of the plurality of objects comprises at least one face (see paragraph [0040]; “photographs are trimmed and processed to be used as the *visible surface* or “skin” of the architectural structure in the final three-dimensional model. A photorealistic model is generated by applying these skins to the *surfaces* of the architectural structures” (emphasis added), the surface is functionally equivalent to the face); and the second set of the plurality of objects comprises at least one face (the surface is functionally equivalent to the face)”

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Maudlin at [0058] “When a user desires information related to a specific portion of the model 54, for example a building, the user only needs to select that portion.”) This is completely different from the “model” recited in claims 1, 18, and 20, because Applicants’ “model” is comprised of interconnected vertices, edges and faces. This is precisely the reason why, as opposed to Applicants’ invention, Maudlin’s alleged invention is not capable of only hiding the “surface” of building 130. Instead, as discussed above, Maudlin only teaches hiding all of building 130 in order to show *different* 3D objects that are positioned behind building 130.

Furthermore, independent claim 20 explicitly requires “automatically suppress display of a first one of the plurality of entities positioned beneath the cursor when the first input data was received *while continuing to display other ones of the plurality of entities.*” (emphasis added) Applicants respectfully submit that this feature of the present invention is neither taught nor suggested by Maudlin. As discussed above, Maudlin merely teaches showing and hiding a 3D object. Maudlin never envisaged showing or hiding a portion of the 3D object, or making a portion of the 3D object transparent.

Finally, Applicants’ respectfully submit that the addition of Gordon, Arnold and/or Schell to Maudlin does not cure the above-mentioned deficiencies in Maudlin.

For at least one of the above-mentioned reasons, withdrawal of the rejection of independent claims 1, 18 and 20 is respectfully requested.

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Claims 2-17 depend on and include all of the limitations of independent claim 1. Therefore, all of the arguments made with respect to claim 1 apply with equal force to claims 2-10. For at least this reason, withdrawal of the rejection of claims 2-10 is respectfully requested.

Claim 19 depends on and includes all of the limitations of independent claim 18. Therefore, all of the arguments made with respect to claim 18 apply with equal force to claim 19. For at least this reason, withdrawal of the rejection of claim 19 is respectfully requested.

Claims 21 and 22 depends on and include all of the limitations of independent claim 20. Therefore, all of the arguments made with respect to claim 20 apply with equal force to claims 21 and 22. For at least this reason, withdrawal of the rejection of claims 21 and 22 is respectfully requested.

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CONCLUSION

In view of the above, each of presently pending claims 1-22 in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicants assert that their invention is not anticipated by the cited prior art. Nevertheless, in the interest of advancing the prosecution of this application, Applicants will fully consider any suggested amendments that would place this application in a condition for allowance.

If there remain any questions regarding the present application, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is cordially requested to contact the undersigned to enable the undersigned to arrange for an interview with the Examiner.

Respectfully submitted,

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